

1 DAYLE ELIESON
United States Attorney
2 District of Nevada
KATHRYN C. NEWMAN
3 KIMBERLY M. FRAYN
Assistant United States Attorneys
4 Nevada Bar 13733
501 Las Vegas Blvd South, Suite 1100
5 Las Vegas, Nevada 89101
P (702) 388-6336/F (702) 388-5087
6 kathryn.newman@usdoj.gov

7 Counsel for Plaintiff United States

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **-oOo-**

12 UNITED STATES OF AMERICA,)	Case No.: 2:16-cr-00283-APG-VCF
)	
13 Plaintiff,)	STIPULATION TO CONTINUE
)	REVOCATION HEARING
14 vs.)	
)	
15 LAZARO JORD RODRIGUEZ-)	
16 HERRERA,)	
)	
17 Defendant.)	

18
19 IT IS HEREBY STIPULATED AND AGREED between the parties, Dayle Elieson, United
20 States Attorney for the District of Nevada, and Kathryn Newman and Kimberly M. Frayn, Assistant
21 United States Attorneys, and Michael Sanft, and Yi Lin Zheng counsel for defendant Lazaro Jord
22 Rodriguez-Herrera, that the supervised release hearing scheduled for April 19, 2018, at 2:00 p.m. to
23 a date and time no sooner than April 23, 2018. For the reasons set forth below, the parties
24 respectfully request that this Stipulation and any Order thereon remain sealed.
25

26 This stipulation is entered into for the following reasons:

1. AUSA Kimberly Frayn, who is lead counsel in this case, is out of the District on training the week of April 16, 2018.

2. Defense counsel Michael Sanft appeared at the defendant's arraignment and initial appearance on April 12, 2018. Mr. Sanft made a record that he was appearing on behalf of Ms. Zheng, however, the Designation of Counsel was signed and filed in his name. As such, we have included Mr. Sanft on this stipulation out of an abundance of caution.

3. The defendant is in custody. He does not object to the brief continuance.

CONCLUSION

For the foregoing reasons, the Government respectfully requests that the revocation hearing of Lazaro Jord Rodriguez-Herrera, currently set for April 19, 2018, at 2:00 p.m., be continued to a date and time convenient to the Court but no sooner than April 23, 2018.

Respectfully submitted,

Date: April 17, 2018	DAYLE ELIESON Acting United States Attorney <u>/s/ Kathryn Newman</u> KATHRYN NEWMAN Assistant United States Attorney
----------------------	---

Date: April 17 , 2018

/s/ Yi Lin Zheng
MICHAEL W. SANFT, ESQ.
YI LIN ZHENG, ESQ.
Counsel for Defendant Rodriguez-Herrera

PROPOSED ORDER

IT IS HEREBY ORDERED that supervised release revocation hearing in the above-captioned case currently set for April 19, 2018, at 2:00 p.m., be vacated and continued to Friday, April 27, 2018 at 9:30 a.m. in Courtroom 6C.

DATED: April 17, 2018.



U.S. DISTRICT JUDGE